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**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN  
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
capacity; OFFICER POOL, in his individual  
capacity; LIEUTENANT PUTNAM, in his  
individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

**UNITED STATES' RESPONSE TO FIRST  
ORDER REGARDING SPECIAL MASTERS**

1 The United States respectfully responds to the Court's First Order Regarding Selection of  
 2 Special Master (doc. 232).

- 3 1. The United States strikes the following individuals from Plaintiffs' list of proposed special  
 4 masters:
  - 5 a. Andrea Armstrong
  - 6 b. Bernadette Brown
  - 7 c. Hon. Beverly Martin
- 8 2. The United States will provide Plaintiffs' counsel with a copy of the March 2022 Dublin  
 9 Task Force Report for the remaining applicants to review pursuant to the Court's First Order  
 10 (doc. 232), but maintain its position that this document should not have been considered in  
 11 deciding the preliminary injunction motion (*see* doc. 135, "[p]ursuant to the Court's  
 12 instruction on the final day of the evidentiary hearing held in this matter, the United States  
 13 submits the following notice of in camera exhibits exchanged with Plaintiffs' counsel on  
 14 January 23, 2024. Any exhibit not listed here was not relied upon by the United States, and  
 15 therefore the Court should not consider the document in deciding the instant motion."). This  
 16 document, as well as the Moss Group report, are being produced under the protective order  
 17 as Attorney Eyes Only, as they remain not for public or party dissemination.
- 18 3. The United States requests that each of its two final candidates be permitted to track their  
 19 time spent preparing the documents requested in paragraph 3 of the Court's First Order, and  
 20 be compensated as provided by 18 U.S.C. § 3626(f)(4).
- 21 6. The United States designates Madison Mattioli as the attorney designated to ask limited  
 22 follow up questions as outlined in paragraph 6 of the Court's First Order. The United States,  
 23 however, respectfully requests that BOP attorney Rob France be permitted to attend the  
 24 interviews.

25  
 26 Dated this 27th day of March, 2024.

27 JESSE A. LASLOVICH  
 28 United States Attorney

/s/ Madison L. Mattioli  
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